

EXHIBIT 1

Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
RS FIT NW LLC,)	
)	Case No. 20-11568 (TMH)
Debtor.)	
)	(Jointly Administered)
<hr/>		
24 HOUR FITNESS WORLDWIDE, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
CONTINENTAL CASUALTY COMPANY;)	Adv. Pro. No. 20-51051 (TMH)
ENDURANCE AMERICAN SPECIALTY)	
INSURANCE COMPANY; STARR SURPLUS)	Related D.I. 231
LINES INSURANCE COMPANY; ALLIANZ)	
GLOBAL RISKS US INSURANCE COMPANY;)	
LIBERTY MUTUAL INSURANCE COMPANY;)	
BEAZLEY-LLOYD'S SYNDICATES 2623/623;)	
ALLIED WORLD NATIONAL ASSURANCE)	
COMPANY; QBE SPECIALTY INSURANCE)	
COMPANY; and GENERAL SECURITY)	
INDEMNITY COMPANY OF ARIZONA,)	
)	
Defendants.)	
<hr/>		

ELEVENTH AMENDED STIPULATED SCHEDULING ORDER

WHEREAS, the above-captioned parties have conferred concerning the above-captioned adversary proceeding's (the "Adversary Proceeding") deadlines and schedule. The parties agree that certain amendments and modifications to the Tenth Amended Stipulated Scheduling Order [D.I. 231], are necessary to promote the efficient and expeditious disposition of the Adversary Proceeding.

THEREFORE, the parties stipulate and agree to amend the Tenth Amended Stipulated Scheduling Order [D.I. 231] as follows:

1. **Dispositive Motion Deadline**: Pursuant to Rule 7007-1 of the Local Rules for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the following deadlines shall apply to the filing and briefing of dispositive motions:
 - a. All dispositive motions shall be filed and served by no later November 10, 2023.
 - b. Opposition papers shall be filed and served by January 12, 2024.
 - c. Reply papers shall be filed and served by February 12, 2024.
2. **Motion to Withdraw the Reference**: Defendants may renew their motion to withdraw the reference of this Adversary Proceeding pursuant to 28 U.S.C. § 157(d) on or before the date that is 14 days following the Court’s entry of an order with respect to the dispositive motions referenced in Paragraph 1(a) herein. Plaintiff reserves all rights to object to any such renewal that Defendants may file, including, but not limited to, objections based on contractual language and, generally, objections to any asserted grounds for withdrawal of the reference.
3. For the avoidance of doubt, all other provisions and deadlines set forth in the Scheduling Order [D.I. 66] shall remain in full force and effect, with the exception of the foregoing deadlines addressed herein.

[Remainder of Page Intentionally Left Blank]

Dated: November 17, 2023

Respectfully submitted,

HOGAN McDANIEL

/s/ Garvan F. McDaniel
Garvan F. McDaniel (No. 4167)
1311 Delaware Avenue
Wilmington, DE 19806
(302) 656-7596
(302) 656-7599 (Fax)
gfmcdaniel@dkhogan.com

Benjamin W. Loveland (admitted *pro hac vice*)

**WILMER CUTLER PICKERING
HALE AND DORR LLP**
60 State Street
Boston, MA 02109
(617) 526-6641
benjamin.loveland@wilmerhale.com

Lauren R. Lifland (admitted *pro hac vice*)

**WILMER CUTLER PICKERING
HALE AND DORR LLP**
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(212) 230-8800
lauren.lifland@wilmerhale.com

*Counsel to Continental Casualty Company;
Starr Surplus Lines Insurance Company;
Allianz Global Risks US Insurance
Company; Certain Underwriters at Lloyd's
of London subscribing to Policy No.
W27C0A190101; incorrectly sued as
"Beazley-Lloyd's Syndicates 2623/623";
QBE Specialty Insurance Company and
General Security Indemnity Company of
Arizona*

REED SMITH LLP

/s/ Mark W. Eckard
Mark W. Eckard (No. 4542)
1201 North Market Street, Suite 1500
Wilmington, DE 19801

(302) 778-7500
(302) 778-7575 (Fax)
meckard@reedsmit.com

David E. Weiss (admitted *pro hac vice*)
T. Connor O'Carroll (admitted *pro hac vice*)
101 Second Street, Suite 1800
San Francisco, CA 94105-3659
(415) 543-8700
(415) 391-8269 (Fax)
dweiss@reedsmit.com
cocarroll@reedsmit.com

*Counsel for Plaintiff 24 HOUR FITNESS
WORLDWIDE, INC.*

DLA PIPER LLP (US)

Matthew S. Sarna (Bar No. 6578)
1201 North Market Street, Suite 2100
Wilmington, DE 19801-1147
(302) 468-5700
(302) 394-2341 (Fax)
Email: matthew.sarna@us.dlapiper.com

Brett Ingerman (admitted *pro hac vice*)

DLA PIPER LLP (US)
The Marbury building
6225 Smith Avenue
Baltimore, MD 21209-3600
(410) 580-3000
(410) 580-3001 (Fax)
Email: brett.ingerman@us.dlapiper.com

*Attorneys for Continental Casualty
Company*

**GELLERT SCALI BUSENKELL &
BROWN, LLC**

/s/ Michael Busenkell
Michael Busenkell (DE No. 3933)
1201 N. Orange Street, Suite 300
Wilmington, DE 19801

(302) 425-5812
mbusenkell@gsbblaw.com

Richard G. Haddad (admitted *pro hac vice*)
OTTERBOURG, P.C.
230 Park Avenue
New York, NY 10169-0075
(212) 661-9100
rhaddad@otterbourg.com

Deanna M. Manzo (admitted *pro hac vice*)
**MOUND COTTON WOLLAN &
GREENGRASS, LLP**
One New York Plaza
New York, NY 10004
Telephone: (212) 804-4200
dmanzo@moundcotton.com

*Counsel to Allied World National Assurance
Company*

Marlie McDonnell (admitted *pro hac vice*)
CLYDE & CO US LLP
271 17th Street NW, Suite 1720
Atlanta, GA 30363
(404) 410-3150
marlie.mcdonnell@clydeco.us

*Counsel to Allianz Global Risks US
Insurance Company*

Courtney E. Murphy (admitted *pro hac vice*)
Kyle M. Medley (admitted *pro hac vice*)
Adam S. Cohen (admitted *pro hac vice*)
HINSHAW & CULBERTSON LLP
800 Third Avenue, 13th Floor
New York, NY 10022
(212) 471-6200
cmurphy@hinshawlaw.com

*Counsel to Starr Surplus Lines Insurance
Company and Certain Underwriters at
Lloyd's of London subscribing to Policy No.
W27C0A190101, incorrectly sued as
"Beazley-Lloyd's Syndicates 2623/623"*

Matthew M. Burke (admitted *pro hac vice*)
ROBINSON & COLE LLP
One Boston Place, 25th Floor
Boston, MA 02108
(617) 557-5996
mburke@rc.com

Douglas R. Gooding (admitted *pro hac vice*)
Jonathan D. Marshall (admitted *pro hac vice*)
CHOATE, HALL & STEWART LLP
Two International Place
Boston, MA 02110
(617) 248-5000
dgooding@choate.com
jmarshall@choate.com

Counsel to Liberty Mutual Fire Insurance Company

Elizabeth Kniffen (admitted *pro hac vice*)
Dennis Anderson (admitted *pro hac vice*)
ZELLE LLP
500 Washington Avenue South, Suite 4000
Minneapolis, MN 55415
(612) 359-4261
ekniffen@zellelaw.com
danderson@zellelaw.com

Counsel to QBE Specialty Insurance Company and General Security Indemnity Company of Arizona